

EXHIBIT A
ISO PETITION AND NOTICE OF REMOVAL

337803

SUM-100

SUMMONS (CITACION JUDICIAL)

NOTICE TO DEFENDANT:**(AVISO AL DEMANDADO):**

FEDEX, INC. and DOES 1 through 100, inclusive, and each of them,

YOU ARE BEING SUED BY PLAINTIFF:**(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

RICHARD CHASE, an individual,

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

Electronically FILED by
Superior Court of California,
County of Los Angeles
6/28/2023 10:39 AM
David W. Slayton,
Executive Officer/Clerk of Court,
By S. Bolden, Deputy Clerk

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response: You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es): Los Angeles Superior Court

111 N. Hill Street, Los Angeles, CA 90012

CASE NUMBER:

(Número del Caso):

23STCV14906

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Charles M. Ray, Spencer Seyb, RAY & SEYB 2062 Business Center Drive, Suite 230, Irvine, California (949) 734-7333

DATE: 06/28/2023

David W. Slayton, Executive Officer/Clerk of Court Clerk, by _____ Deputy _____

(Fecha) 06/28/2023

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

(SEAL)

**NOTICE TO THE PERSON SERVED:** You are served

1. as an individual defendant.
2. as the person sued under the fictitious name of (specify): _____
3. on behalf of (specify): **FedEx, Inc**
 under: CCP 416.10 (corporation) CCP 416.60 (minor)
 CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
 CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
 other (specify): _____
4. by personal delivery on (date): _____

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Form Adopted for Mandatory Use
 Judicial Council of California
 SUM-100 [Rev. July 1, 2009]

SUMMONS

Code of Civil Procedure §§ 412.20, 465
www.courts.ca.gov

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1 RAY & SEYB LLP
2 CHARLES M. RAY SBN 282440
3 SPENCER L. SEYB, SBN 282501
4 2062 Business Center Dr. Suite 230
5 Irvine, CA 92612
6 Tele: 949-734-7333
7 Fax: 949-274-8151
8 c.ray@rayseyb.com
9 s.seyb@rayseyb.com

10 Attorneys for Plaintiff,
11 RICHARD CHASE

12
13
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 FOR THE COUNTY OF LOS ANGELES

16 RICHARD CHASE an individual,

17 Plaintiff,

18 v.

19 FEDEX, INC.; and DOES 1 through 100,
20 inclusive, and each of them,

21 Defendants,

22 CASE No.:
23 [Before the Hon.]

24 COMPLAINT FOR MONETARY
25 DAMAGES AND DEMAND FOR JURY
TRIAL.

1. WRONGFUL TERMINATION / IN VIOLATION OF PUBLIC POLICY;
2. DISABILITY DISCRIMINATION
3. RETALIATION
4. HOSTILE WORK ENVIRONMENT;
5. FAILURE TO PREVENT DISCRIMINATION, HARASSMENT, OR RETALIATION;
6. FAILURE TO ACCOMMODATE
7. FAILURE TO ENGAGE IN THE INTERACTIVE PROCESS
8. NEGLIGENT HIRING, TRAINING, SUPERVISION AND RETENTION;
9. INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS.





I. **INTRODUCTION**

Defendants while employing Plaintiff permitted and fostered a work environment that included discriminating employees on the basis of disability. By use of seniority, required work function attendance among others, Defendants and their managing agents exploited Plaintiff by building a false sense of sincerity which ultimately mutated into a false facade of trust and closeness. The employment relationship was used and abused as a vehicle for this agenda and was dependent on it. As time quickly told, Plaintiff came to the realization of his differential treatment as a result of his disability. Consequently, Plaintiff was terminated from his position with Defendants.

II. PARTIES AND JURISDICTION

1. Plaintiff RICHARD CHASE (herein "Plaintiff") is an individual residing in Orange, CA.
2. Defendant FedEx, Inc. (herein "Defendant") is a business entity, located in California, County of Los Angeles, at 330 N. Brand Blvd., Suite 700, Glendale, CA 91203.
3. Defendant and Does 1 through 100, at all relevant times were the agents and employees of one another, ratifying the acts of one another, and in doing the things hereinafter alleged were acting within the course and scope of the agency.
4. Plaintiff is ignorant of the true names and capacities of Defendants sued herein as Does 1 through 100, inclusive, and therefore sues these Defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained.
5. Plaintiff is informed and believes, and thereupon alleges that at all times herein mentioned, the Defendants were the agents, employees and/or servants, masters or employers of the remaining defendants and in doing the things herein after alleged, were

1 acting within the course and scope of such agency or employment, and with the
 2 approval and ratification of each of the other defendants.

3 6. Plaintiff is informed and believe and thereon alleges that each of the fictitiously named
 4 Defendant is responsible in some manner for the occurrences hereinafter alleged, and
 5 that Plaintiff's injuries as herein alleged were proximately caused by the
 6 aforementioned Defendants.

7 7. The unlawful conduct alleged herein was committed within the County of Los Angeles
 8 County.

9 **III. FACTS COMMON TO ALL CAUSES OF ACTION**

10 8. Plaintiff began his employment with Defendants as a driver on July 7, 1997. Plaintiff's
 11 job duties consisted of working driving, transporting and moving freight, moving large
 12 containers weighing over 6,000 pounds, and loading trucks.

13 9. On or about November 2021, Plaintiff began to experience pain to his hip during the
 14 course and scope of his employment with Defendants. Plaintiff reported such pain to his
 15 supervisor, Jeff, who did not send Plaintiff to seek medical care.

16 10. Plaintiff's injuries to his hip were noticed by most of Defendants' employees given the
 17 notable discomfort and limping displayed by Plaintiff while working. Plaintiff would
 18 constantly be asked about his injuries and how he was doing by other coworkers. At
 19 times, Defendant employees would even joke about Plaintiff's injuries. When an
 20 employee was either walking slow or limping, one would say, "Why are you walking
 21 like Richard?"

22 11. On or about April of 2022, Plaintiff was terminated from his employment with
 23 Defendants for an allegation regarding using an inappropriate word. Plaintiff sought
 24 further information regarding such allegation, but was instead provided with vague
 25





1 information that would not assist Plaintiff with necessary information as part of any
2 investigation.

3 12. On or about May 2022, Plaintiff was reinstated to work with Defendants after a further
4 review of the allegation against Plaintiff.

5 13. On May 11, 2022, after Plaintiff was reinstated with Defendants, Plaintiff underwent a
6 hip replacement surgery that was related to the previous injury outlined in paragraphs
7 nine and ten.

8 14. On August 15, 2022, Plaintiff returned to work after undergoing his hip replacement
9 surgery and on Plaintiff's first day of returning to work, Plaintiff was called into an
10 office to take part in a zoom meeting with Defendant's senior manager and human
11 resources. Such meeting was to discuss the allegation of the inappropriate word Plaintiff
12 had supposedly said.

13 15. On August 25, 2022, Plaintiff was terminated from his employment with Defendants.
14 Defendants did not provide any clear reason to Plaintiff other than that his termination
15 had to do with the previous allegation regarding the inappropriate word.
16

17 **IV. EXHAUSTION OF REMEDIES**

18 16. Plaintiff has exhausted all applicable administrative remedies. On June 22, 2023, an
19 Administrative Complaint was filed on Plaintiff's behalf with the California Department
20 of Fair Employment and Housing as to Defendants Only and a Right to Sue notice was
21 issued on that same day with assigned Case No.: 202306-21063422and is attached hereto
22 as Exhibit A.

23 **V. FIRST CAUSE OF ACTION**

24 **WRONGFUL TERMINATION**
25 **(Against all Defendants)**

26 17. Plaintiff restates and incorporates herein by reference each and every allegation
27



1 contained in paragraphs 1 through 16, inclusive, above.

2 18. Defendant's retaliation, harassment and discrimination was a violation of California
3 Government Code § 12940.

4 19. Plaintiff has been damaged as alleged above as a legal result of Defendant's unlawful
5 retaliation and harassment.

6 20. Plaintiff received a right-to-sue letter from the DFEH and filed this action in a timely
7 manner thereafter, a copy of which is attached hereto as Exhibit A. Accordingly,
8 Plaintiff has timely complied with all prerequisites to suit.

9 21. The above-alleged actions of defendants were done with malice, fraud or oppression,
10 and in reckless disregard of plaintiff's rights under FEHA, California Civil Code § 3294
11 and in violation of the public policy of California. Specifically, defendants retaliated,
12 harassed and discriminated against Plaintiff thereby entitling plaintiff to exemplary or
13 punitive damages.

14 22. As a proximate result of Defendant's wrongful actions against Plaintiff, as alleged
15 above, Plaintiff has been harmed in that Plaintiff has suffered the loss of wages, salary,
16 benefits, and additional amounts of money Plaintiff would have received if Plaintiff had
17 not been wrongfully terminated by Defendant. As a further proximate result of
18 Defendant's wrongful actions against Plaintiff as alleged above, Plaintiff has been
19 harmed in that Plaintiff has suffered intangible loss of employment-related
20 opportunities. As a further proximate result of Defendant's wrongful actions against
21 Plaintiff, as alleged above, Plaintiff has been harmed in that Plaintiff has suffered
22 humiliation, mental anguish, emotional and physical distress, anxiety, and has been
23 injured in the mind and body.

24 23. The wrongful conduct of Defendant set forth herein above was perpetrated upon
25
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1 Plaintiff intentionally, willfully, fraudulently, in conscious disregard of Plaintiff's rights
 2 and safety and with a callous indifference to the injurious consequences which were
 3 substantially certain to occur and was shameful, despicable and deplorable. Plaintiff is
 4 further informed and believes that each business or corporate employer, through its
 5 officers, directors and managing agents, and each individual defendant, including
 6 without limitation, had advance knowledge of the wrongful conduct set forth above and
 7 allowed said wrongful conduct to occur and continue to occur, thereby ratifying said
 8 wrongful conduct, with a conscious disregard of the rights and safety of Plaintiff, and
 9 after becoming aware of their wrongful conduct, each corporate Defendant by and
 10 through its officers, directors and managing agents, and each individual Defendant,
 11 authorized and ratified the wrongful conduct herein alleged. Therefore, Plaintiff seeks
 12 exemplary and punitive damages against Defendant in an amount per proof.
 13

14 VI. SECOND CAUSE OF ACTION

15 DISABILITY DISCRIMINATION 16 (Against all Defendants)

17 24. Plaintiff restates and incorporates by reference each and every allegation contained in
 18 paragraphs 1 through 23, inclusive, as though fully set forth herein.

19 25. At all times relevant to this Complaint, California Government Code § 12900 et seq.
 20 and its implementing regulations was in full force and effect.

21 26. Pursuant to Government Code § 12940(a) it is unlawful for an employer to discriminate
 22 against an employee because of that employee's physical or mental disability

23 27. Pursuant to Government Code § 12940(m), it is unlawful for an employer to fail or
 24 refuse to provide a reasonable accommodation to an employee with a physical or mental
 25 disability.

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- 1 28. Pursuant to Government Code § 12940(n), it is unlawful for an employer to fail to
2 engage in the interactive process to assess whether or not a reasonable accommodation
3 could be made for an employee with a physical or mental disability.
- 4 29. Pursuant to Government Code § 12926 and § 12926.1, and the DFEH, irritable bowel
5 syndrome qualifies as a physical disability. In addition, the Defendants regarded or
6 treated Plaintiff as though he had a disability as defined by these sections.
- 7 30. Pursuant to FEHA, a disability can be defined as a physical or mental impairment that
8 limits a major life function, such as working. Under the FEHA, irritable bowel
9 syndrome, would qualify as a disability.
- 10 31. At all times relevant to this Complaint, Plaintiff was qualified for, and could perform
11 the essential functions of his position with the Defendants, with or without reasonable
12 accommodation.
- 13 32. The Defendants violated Government Code § 12940(a), (m), and (n) by, among other
14 things, failing to engage in the interactive process, failing to provide reasonable
15 accommodations, and terminating Plaintiff's employment.
- 16 33. Plaintiff received a right-to-sue letter from the DFEH and filed this action in a timely
17 manner thereafter, a copy of which is attached hereto as Exhibit A. Accordingly,
18 Plaintiff has timely complied with all prerequisites to suit.
- 19 34. As a direct and proximate result of Defendants' wrongful conduct, Plaintiff has suffered
20 damages including, but not limited to, a loss of income and benefits, and has further
21 suffered emotional distress and other general damages.
- 22 35. Plaintiff was injured and damaged as alleged above as a direct and legal result of the
23 Defendants' conduct.
- 24
- 25
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1 after becoming aware of their wrongful conduct, each corporate Defendant by and
 2 through its officers, directors and managing agents, and each individual Defendant,
 3 authorized and ratified the wrongful conduct herein alleged. Therefore, Plaintiff seeks
 4 exemplary and punitive damages against Defendant in an amount according to proof.

5 **VII. THIRD CAUSE OF ACTION**

6 **RETALIATION**

7 (Against All DEFENDANTS)

39. Plaintiff restates and incorporates by reference each and every allegation contained in
 40. paragraphs 1 through 38 inclusive, as though fully set forth herein.
 41. In violation of Cal. Govt. Code 12940, et seq., Defendant, as alleged herein above,
 42. retaliated against Plaintiff for informing management about continued racial harassment
 43. and a hostile work environment, a protected activity, by subjecting her to adverse
 44. employment actions including, but not limited to the following:
 45. a) Treating Plaintiff less favorably than her co-workers;
 46. b) Denying Plaintiff the benefits and privileges of his employment;
 47. c) Subjecting Plaintiff to unwarranted disciplinary actions;
 48. d) Defaming Plaintiff's character and professional reputation;
 49. Plaintiff received a right-to-sue letter from the DFEH and filed this action in a timely
 50. manner thereafter, a copy of which is attached hereto as Exhibit A. Accordingly,
 51. Plaintiff has timely complied with all prerequisites to suit.
 52. As a proximate result of Defendant's wrongful actions against Plaintiff, as alleged
 53. above, Plaintiff has been harmed in that Plaintiff has suffered the loss of wages, salary,
 54. benefits, and additional amounts of money Plaintiff would have received if Plaintiff had
 55. not been wrongfully terminated by Defendant. As a further proximate result of
 56. Defendant's wrongful actions against Plaintiff as alleged above, Plaintiff has been





harmed in that Plaintiff has suffered intangible loss of employment-related opportunities. As a further proximate result of Defendant's wrongful actions against Plaintiff, as alleged above, Plaintiff has been harmed in that Plaintiff has suffered humiliation, mental anguish, emotional and physical distress, anxiety, and has been injured in the mind and body.

43. The wrongful conduct of Defendant set forth herein above was perpetrated upon Plaintiff intentionally, willfully, fraudulently, in conscious disregard of Plaintiff's rights and safety and with a callous indifference to the injurious consequences which were substantially certain to occur and was shameful, despicable and deplorable. Plaintiff is further informed and believes that each business or corporate employer, through its officers, directors and managing agents, had advance knowledge of the wrongful conduct set forth above and allowed said wrongful conduct to occur and continue to occur, thereby ratifying said wrongful conduct, with a conscious disregard of the rights and safety of Plaintiff, and after becoming aware of their wrongful conduct, each corporate Defendant by and through its officers, directors and managing agents, and each individual Defendant, authorized and ratified the wrongful conduct herein alleged.
44. The conduct of Defendant and Does 1 through 100 and/or their agents, employees, and supervisors as described herein was malicious, oppressive, and done with willful and conscious disregard for Plaintiff's rights and for the deleterious consequences of Defendant's actions. Defendant authorized, condoned and ratified the unlawful conduct of each and every one of them. Consequently, Plaintiff is entitled to an award of punitive damages in an amount to be determined at trial.
45. Plaintiff is further informed and believes that each business or employer, through its officers, directors and managing agents, and each individual Defendant had advance



knowledge of the wrongful conduct set forth above and allowed said wrongful conduct to occur and continue to occur, thereby ratifying said wrongful conduct, with a conscious disregard of the rights and safety of Plaintiff and for the deleterious consequences of Defendant's actions, and after becoming aware of their wrongful conduct, each Defendant by and through its agents, and each individual Defendant, authorized and ratified the wrongful conduct herein alleged.

VIII. **FOURTH CAUSE OF ACTION**

HOSTILE WORK ENVIRONMENT (Against All DEFENDANTS)

46. Plaintiff incorporates by reference and realleges paragraphs 1 through 45, inclusive, as though set forth fully herein.
47. Defendants' actions, as alleged above, resulted in a work environment which was hostile to Plaintiff and said hostile environment permeated Plaintiff's workplace. Additionally, Defendants' actions as alleged above were unwelcome to Plaintiff and negatively altered Plaintiff's workplace by creating an environment hostile to Plaintiff.
48. Defendant and DOES 1 - 100, and each of them, caused, allowed, and failed to prevent a hostile work environment for Plaintiff.
49. As a result of such discrimination, as ratified and authorized by Defendants, Plaintiff was violated in her person, humiliated, and subjected to severe emotional distress and damage as well.
50. The foregoing conduct violates the California Fair Employment and Housing Act, Government Code Section 12940, et seq.
51. Plaintiff received a right-to-sue letter from the DFEH and filed this action in a timely manner thereafter, a copy of which is attached hereto as Exhibit A. Accordingly, Plaintiff has timely complied with all prerequisites to suit.



1 52. The conduct of Defendant and Does 1 through 100 and/or their agents, employees, and
2 supervisors as described herein was malicious, oppressive, and done with willful and
3 conscious disregard for Plaintiff's rights and for the deleterious consequences of
4 Defendants' actions. Defendants authorized, condoned, and ratified the unlawful
5 conduct of each and every one of them. Consequently, Plaintiff is entitled to an award
6 of punitive damages in an amount to be determined at trial.
7
8 53. Plaintiff is further informed and believes that each business or employer, through its
9 officers, directors and managing agents, and each individual Defendant had advance
10 knowledge of the wrongful conduct set forth above and allowed said wrongful conduct
11 to occur and continue to occur, thereby ratifying said wrongful conduct, with a
12 conscious disregard of the rights and safety of Plaintiff. For the deleterious
13 consequences of Defendants' actions, and after becoming aware of their wrongful
14 conduct, each Defendant by and through its agents, and each individual Defendant,
15 authorized and ratified the wrongful conduct herein alleged.
16
17 54. Plaintiff is further informed and believes and based thereon alleges that at all times
18 relevant hereto, Defendants, and each of them, were the agents, employees, managing
19 agents, supervisors, co-conspirators, parent corporation, joint employers, alter egos,
20 and/or joint ventures of the other Defendants, and each of them, and in doing the things
21 alleged herein, were acting at least in part within the course and scope of said agency,
22 employment, conspiracy, joint employer, alter ego status, and/or joint venture and with
23 the permission and consent of each of the other Defendants

24
IX. FIFTH CAUSE OF ACTION

25
FAILURE TO PREVENT DISCRIMINATION, HARASSMENT OR RETALIATION
(Against All DEFENDANTS)

26 55. Plaintiff incorporates by reference and realleges paragraphs 1 through 54 inclusive, as
27



1 though set forth fully herein.

2 56. California Government Code section 12940(k) provides that it is unlawful for any
3 employer or covered entity to fail to take all reasonable steps necessary to prevent
4 retaliation from occurring.

5 57. Defendant failed to take all reasonable steps necessary to prevent retaliation from
6 occurring.

7 58. Again, Defendant allowed Plaintiff to be to unpaid wages and prohibited Plaintiff from
8 taking proper meal and rest breaks.

9 59. Among other things, Defendant failed to train and adequately supervise its employees in
10 order to ensure that these employees were not violating the Fair Employment and
11 Housing Act in their treatment of other employees.

12 60. In committing these actions, Defendant violated the Fair Employment and Housing Act.
13 Defendant committed the acts alleged herein oppressively and maliciously, with the
14 wrongful intention of injuring Plaintiff.

15 61. Defendant, from an evil and improper motive amounting to malice, and in conscious
16 disregard of Plaintiff's rights, in that Defendant failed to take all reasonable steps
17 necessary to prevent discrimination and harassment from occurring. Thus, Plaintiff is
18 entitled to recover punitive damages from Defendant.

19 62. As a proximate result of the acts of Defendant, Plaintiff has suffered damages in an
20 amount according to proof.

21 63. The conduct of Defendants and Does 1 through 100 and/or their agents, employees, and
22 supervisors as described herein was malicious, oppressive, and done with willful and
23 conscious disregard for Plaintiff's rights and for the deleterious consequences of
24 Defendants' actions. Defendants authorized, condoned, and ratified the unlawful

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1 conduct of each and every one of them. Consequently, Plaintiff is entitled to an award
2 of punitive damages in an amount to be determined at trial.

3 **X. SIXTH CAUSE OF ACTION**

4 **FAILURE TO ACCOMMODATE**
5 **(Against All DEFENDANTS)**

64. Plaintiff restates and incorporates by reference each and every allegation contained in
6 paragraphs 1 through 60, inclusive, as though fully set forth herein.

65. ADA [42 USC §12112(b)(5)(A); 29 CFR §1630.9 & Pt. 1630, App. §1630.9]; and
8 California Government Code §12940(m) provides that it is unlawful for an employer to
9 fail to make reasonable accommodation for the known physical disability of an
10 employee.

66. Defendants failed to make reasonable accommodation for Plaintiff's known disabilities
12 of his hips and failed to make adequate job changes to accommodate which culminated
13 in Defendant terminated Plaintiff's employment.

67. As a proximate result of the wrongful conduct of Defendants, and each of them,
15 Plaintiff has suffered and continues to sustain substantial losses in earnings and other
16 employment benefits in an amount according to proof at the time of trial.

68. As a proximate result of the wrongful conduct of Defendants, and each of them,
18 Plaintiff has suffered humiliation, emotional distress, and mental pain and anguish, all
19 to his damage in an amount according to proof at the time of trial.

21 69. The conduct of Defendant and Does 1 through 100 and/or their agents, employees, and
22 supervisors as described herein was malicious, oppressive, and done with willful and
23 conscious disregard for Plaintiff's rights and for the deleterious consequences of
24 Defendant's actions. Defendant authorized, condoned and ratified the unlawful conduct

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1 of each and every one of them. Consequently, Plaintiff is entitled to an award of
 2 punitive damages in an amount to be determined at trial.

3 **XI. SEVENTH CAUSE OF ACTION**

4 **FAILURE TO ENGAGE IN THE INTERACTIVE PROCESS**
 (Against All DEFENDANTS)

5 70. Plaintiff restates and incorporates by reference each and every allegation contained in
 6 paragraphs 1 through 69, inclusive, as though fully set forth herein.

7 71. California Government Code section 12940(n) provides that it is unlawful for any
 8 employer or covered entity to fail to engage in a timely, good faith, interactive process
 9 with the employee to determine effective reasonable accommodations, if any, in
 10 response to a request for reasonable accommodation by an employee with a known
 11 physical disability or known medical condition.

12 72. At all times relevant hereto, Defendant was aware of Plaintiff's physical disability.
 13 Defendant failed to engage in a timely, good faith, interactive process with Plaintiff to
 14 determine effective reasonable accommodations for Plaintiff.

15 73. In committing these actions, Defendant violated the Fair Employment and Housing Act.

16 74. Defendant committed the acts alleged herein oppressively and maliciously, with the
 17 wrongful intention of injuring Plaintiff, from an evil and improper motive amounting to
 18 malice, and in conscious disregard of Plaintiff's rights, in that Defendant failed to
 19 engage in a timely, good faith, interactive process with Plaintiff despite the fact that
 20 they were aware that Plaintiff were disabled. Thus, Plaintiff is entitled to recover
 21 punitive damages from Defendant.

22 75. As a proximate result of the acts of Defendant, Plaintiff has suffered damages in an
 23 amount according to proof.

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76. The conduct of Defendant and Does 1 through 100 and/or their agents, employees, and supervisors as described herein was malicious, oppressive, and done with willful and conscious disregard for Plaintiff's rights and for the deleterious consequences of Defendants' actions. Defendants authorized, condoned and ratified the unlawful conduct of each and every one of them. Consequently, Plaintiff is entitled to an award of punitive damages in an amount to be determined at trial.

XII. EIGHTH CAUSE OF ACTION

**NEGIGENT HIRING, TRAINING, SUPERVISION AND RETENTION
(Against All DEFENDANTS)**

77. Plaintiff incorporates by reference and realleges paragraphs 1 through 76, inclusive, as though set forth fully herein.
78. Defendants owed Plaintiff a duty to protect her from employees who they knew or should have known created a risk of injury to Plaintiff. Defendants breached such duty by hiring and continuing to employ such employees, and by failing to adequately supervise the workplace despite the fact that they knew, or should have known, that the work environment was unsafe, hostile, and retaliatory to Plaintiff and others, as alleged herein.
79. By Defendants' aforesaid acts and omissions, Plaintiff has been directly and legally caused to suffer actual damages including, but not limited to, loss of earnings and future earning capacity, attorneys' fees, costs of suit and other pecuniary loss not presently ascertained, in an amount according to proof at the time of trial.
80. As a proximate result of Defendant's wrongful actions against Plaintiff, as alleged above, Plaintiff has been harmed in that Plaintiff has suffered the loss of wages, salary, benefits, and additional amounts of money Plaintiff would have received if Plaintiff had not been wrongfully terminated by Defendant. As a further proximate result of



1 Defendant's wrongful actions against Plaintiff as alleged above, Plaintiff has been
 2 harmed in that Plaintiff has suffered intangible loss of employment-related
 3 opportunities. As a further proximate result of Defendant's wrongful actions against
 4 Plaintiff, as alleged above, Plaintiff has been harmed in that Plaintiff has suffered
 5 humiliation, mental anguish, emotional and physical distress, anxiety, and has been
 6 injured in the mind and body.

7 81. The wrongful conduct of Defendant set forth herein above was perpetrated upon
 8 Plaintiff intentionally, willfully, fraudulently, in conscious disregard of Plaintiff's rights
 9 and safety and with a callous indifference to the injurious consequences which were
 10 substantially certain to occur and was shameful, despicable and deplorable. Plaintiff is
 11 further informed and believes that each business or corporate employer, through its
 12 officers, directors and managing agents, and each individual defendant, including
 13 without limitation, had advance knowledge of the wrongful conduct set forth above and
 14 allowed said wrongful conduct to occur and continue to occur, thereby ratifying said
 15 wrongful conduct, with a conscious disregard of the rights and safety of Plaintiff, and
 16 after becoming aware of their wrongful conduct, each corporate Defendant by and
 17 through its officers, directors and managing agents, and each individual Defendant,
 18 authorized and ratified the wrongful conduct herein alleged. Therefore, Plaintiff seeks
 19 exemplary and punitive damages against Defendant in an amount according to proof.

21 **XIII. NINTH CAUSE OF ACTION**

22 **INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS**
 23 **(Against All DEFENDANTS)**

24 82. Plaintiff incorporates by reference and realleges paragraphs 1 through 81, inclusive, as
 25 though set forth fully herein.
 26 83. Defendants' conduct was done with reckless disregard of the probability of causing



1 Plaintiff emotional distress or with the intent of causing Plaintiff to suffer emotional
2 distress.

3 84. Plaintiff did in fact suffer severe emotional distress. Plaintiff's emotional distress was a
4 direct and proximate result of the outrageous conduct of Defendants.

5 85. Moreover, Defendants' conduct was oppressive, fraudulent, malicious, despicable, and
6 outrageous, and was carried on by Defendants with willful disregard of the rights or
7 safety of Plaintiff. Defendants therefore subjected Plaintiff to cruel and unjust hardship
8 in conscious disregard of Plaintiff's rights. As a further proximate result of Defendants'
9 actions against Plaintiff, as alleged above, Plaintiff has been harmed in that Plaintiff has
10 suffered humiliation, mental anguish, emotional and physical distress, anxiety, and has
11 been injured in the mind and body. Plaintiff is thereby entitled to general and
12 compensatory damages in an amount to be proven at trial.

13 86. Plaintiff is further informed and believes that each business or employer, through its
14 officers, directors and managing agents, and each individual Defendant had advance
15 knowledge of the wrongful conduct set forth above and sanctioned said wrongful
16 conduct, thereby ratifying it, with a conscious disregard of the rights and safety of
17 Plaintiff and for the deleterious consequences of Defendants' actions, and after
18 becoming aware of their wrongful conduct, each Defendant by and through its agents,
19 and each individual Defendant, authorized and ratified the wrongful conduct herein
20 alleged.

21 87. Plaintiff is further informed and believes and based thereon alleges that at all times
22 relevant hereto, Defendants, and each of them, were the agents, employees, managing
23 agents, supervisors, co-conspirators, parent corporation, joint employers, alter egos,
24 and/or joint ventures of the other Defendants, and each of them, and in doing the things
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alleged herein, were acting at least in part within the course and scope of said agency, employment, conspiracy, joint employer, alter ego status, and/or joint venture and with the permission and consent of each of the other Defendants.

88. The conduct of Defendant, and Does 1 through 100 and/or their agents, employees, supervisors as described herein was malicious, oppressive, and done with willful and conscious disregard for Plaintiff's rights and for the deleterious consequences of Defendants' actions. Defendants authorized, condoned, and ratified the unlawful conduct of each and every one of them. Consequently, Plaintiff is entitled to an award of punitive damages in an amount to be determined at trial.

XIV. PRAYER FOR RELIEF

WHEREFORE, Plaintiff RICHARD CHASE on behalf of his self, requests the following relief as against Defendant and DOES 1 through 100, as follows:

1. For compensatory economic damages according to proof including losses incurred in seeking substitute employment and loss of earnings, and other employment benefits;
2. For compensatory non-economic damages for losses resulting from humiliation, mental anguish, and emotional distress according to proof;
3. For punitive damages according to proof;
4. For costs incurred by Plaintiff, including reasonable attorneys' fees;
5. For such other and further relief as the Court may deem proper.
6. Plaintiff further requests a jury trial on all issues.

XV. DEMAND FOR JURY TRIAL

Plaintiff RICHARD CHASE requests a jury trial on all issues.

Respectfully submitted,

1 DATED: June 27, 2023

RAY & SEYB LLP

2 By: 

3 Charles M. Ray
4 Attorney for Plaintiff
5 RICHARD CHASE



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27 COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL

Ray&Seybold LLP



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EXHIBIT A

-21-

COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Charles M. Ray SBN 282440; Spencer L. Seyb, SBN 282501 RAY & SEYB LLP, 2062 Business Center Drive, Suite 230, Irvine, California 92612		FOR COURT USE ONLY
TELEPHONE NO.: (949) 734-7333 FAX NO.: ATTORNEY FOR (Name): Plaintiff, Richard Chase		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 N. Hill St. MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Stanley Mosk Courthouse		
CASE NAME: RICHARD CHASE v. FEDEX INC.		
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited <input type="checkbox"/> Limited (Amount demanded exceeds \$25,000) (Amount demanded is \$25,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
		CASE NUMBER: ADJ16788266
		JUDGE: DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort	Contract	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403)
<input type="checkbox"/> Auto (22)	<input type="checkbox"/> Breach of contract/warranty (06)	<input type="checkbox"/> Antitrust/Trade regulation (03)
<input type="checkbox"/> Uninsured motorist (46)	<input type="checkbox"/> Rule 3.740 collections (09)	<input type="checkbox"/> Construction defect (10)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort	<input type="checkbox"/> Other collections (09)	<input type="checkbox"/> Mass tort (40)
<input type="checkbox"/> Asbestos (04)	<input type="checkbox"/> Insurance coverage (18)	<input type="checkbox"/> Securities litigation (28)
<input type="checkbox"/> Product liability (24)	<input type="checkbox"/> Other contract (37)	<input type="checkbox"/> Environmental/Toxic tort (30)
<input type="checkbox"/> Medical malpractice (45)	Real Property	<input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)
<input type="checkbox"/> Other PI/PD/WD (23)	<input type="checkbox"/> Eminent domain/Inverse condemnation (14)	Enforcement of Judgment
Non-PI/PD/WD (Other) Tort	<input type="checkbox"/> Wrongful eviction (33)	<input type="checkbox"/> Enforcement of judgment (20)
<input type="checkbox"/> Business tort/unfair business practice (07)	<input type="checkbox"/> Other real property (26)	Miscellaneous Civil Complaint
<input type="checkbox"/> Civil rights (08)	Unlawful Detainer	<input type="checkbox"/> RICO (27)
<input type="checkbox"/> Defamation (13)	<input type="checkbox"/> Commercial (31)	<input type="checkbox"/> Other complaint (not specified above) (42)
<input type="checkbox"/> Fraud (16)	<input type="checkbox"/> Residential (32)	Miscellaneous Civil Petition
<input type="checkbox"/> Intellectual property (19)	<input type="checkbox"/> Drugs (38)	<input type="checkbox"/> Partnership and corporate governance (21)
<input type="checkbox"/> Professional negligence (25)	Judicial Review	<input type="checkbox"/> Other petition (not specified above) (43)
<input type="checkbox"/> Other non-PI/PD/WD tort (35)	<input type="checkbox"/> Asset forfeiture (05)	
Employment	<input type="checkbox"/> Petition re: arbitration award (11)	
<input checked="" type="checkbox"/> Wrongful termination (36)	<input type="checkbox"/> Writ of mandate (02)	
<input type="checkbox"/> Other employment (15)	<input type="checkbox"/> Other judicial review (39)	

2. This case is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a. Large number of separately represented parties
- b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
- c. Substantial amount of documentary evidence
- d. Large number of witnesses
- e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- f. Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive

4. Number of causes of action (specify): 9

5. This case is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: June 27, 2023

CHARLES M. RAY

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

CM-010

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

Auto Tort

- Auto (22)–Personal Injury/Property
- Damage/Wrongful Death
- Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

- Asbestos (04)
- Asbestos Property Damage
- Asbestos Personal Injury/
Wrongful Death
- Product Liability (*not asbestos or toxic/environmental*) (24)
- Medical Malpractice (45)
- Medical Malpractice—
Physicians & Surgeons
- Other Professional Health Care
Malpractice
- Other PI/PD/WD (23)
- Premises Liability (e.g., slip and fall)
- Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
- Intentional Infliction of
Emotional Distress
- Negligent Infliction of
Emotional Distress
- Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
- Defamation (e.g., slander, libel) (13)
- Fraud (16)
- Intellectual Property (19)
- Professional Negligence (25)
- Legal Malpractice
- Other Professional Malpractice (*not medical or legal*)
- Other Non-PI/PD/WD Tort (35)

Employment

- Wrongful Termination (36)
- Other Employment (15)

CASE TYPES AND EXAMPLES**Contract**

- Breach of Contract/Warranty (06)
- Breach of Rental/Lease
- Contract (*not unlawful detainer or wrongful eviction*)
- Contract/Warranty Breach–Seller Plaintiff (*not fraud or negligence*)
- Negligent Breach of Contract/
Warranty
- Other Breach of Contract/Warranty
- Collections (e.g., money owed, open book accounts) (09)
- Collection Case–Seller Plaintiff
- Other Promissory Note/Collections Case
- Insurance Coverage (*not provisionally complex*) (18)
- Auto Subrogation
- Other Coverage
- Other Contract (37)
- Contractual Fraud
- Other Contract Dispute

Real Property

- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
- Writ of Possession of Real Property
- Mortgage Foreclosure
- Quiet Title
- Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

- Commercial (31)
- Residential (32)
- Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
- Writ–Administrative Mandamus
- Writ–Mandamus on Limited Court Case Matter
- Writ–Other Limited Court Case Review
- Other Judicial Review (39)
- Review of Health Officer Order
- Notice of Appeal–Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

- Enforcement of Judgment (20)
- Abstract of Judgment (Out of County)
- Confession of Judgment (*non-domestic relations*)
- Sister State Judgment
- Administrative Agency Award (*not unpaid taxes*)
- Petition/Certification of Entry of Judgment on Unpaid Taxes
- Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

- RICO (27)
- Other Complaint (*not specified above*) (42)
- Declaratory Relief Only
- Injunctive Relief Only (*non-harassment*)
- Mechanics Lien
- Other Commercial Complaint Case (*non-tort/non-complex*)
- Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

- Partnership and Corporate Governance (21)
- Other Petition (*not specified above*) (43)
- Civil Harassment
- Workplace Violence
- Elder/Dependent Adult Abuse
- Election Contest
- Petition for Name Change
- Petition for Relief From Late Claim
- Other Civil Petition

SHORT TITLE Chase v. FedEx	CASE NUMBER
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CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION**(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)****This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court**

Step 1: After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

Step 2: In Column B, check the box for the type of action that best describes the nature of the case.

Step 3: In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Courthouse Location (Column C)

1. Class Actions must be filed in the Stanley Mosk Courthouse, Central District.	7. Location where petitioner resides.
2. Permissive filing in Central District.	8. Location wherein defendant/respondent functions wholly.
3. Location where cause of action arose.	9. Location where one or more of the parties reside.
4. Location where bodily injury, death or damage occurred.	10. Location of Labor Commissioner Office.
5. Location where performance required, or defendant resides.	11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection).
6. Location of property or permanently garaged vehicle.	

	A CIVIL Case Cover Sheet Case Type	B Type of Action (check only one)	C Applicable Reasons (see Step 3 above)
Auto Tort	Auto (22)	<input type="checkbox"/> 2201 Motor Vehicle – Personal Injury/Property Damage/Wrongful Death	1, 4
	Uninsured Motorist (46)	<input type="checkbox"/> 4601 Uninsured Motorist – Personal Injury/Property Damage/Wrongful Death	1, 4
Other Personal Injury/ Property Damage/ Wrongful Death	Other Personal Injury/ Property Damage/ Wrongful Death (23)	<input type="checkbox"/> 2301 Premise Liability (e.g., dangerous conditions of property, slip/trip and fall, dog attack, etc.)	1, 4
		<input type="checkbox"/> 2302 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, battery, vandalism, etc.)	1, 4
		<input type="checkbox"/> 2303 Intentional Infliction of Emotional Distress	1, 4
		<input type="checkbox"/> 2304 Other Personal Injury/Property Damage/Wrongful Death	1, 4
		<input type="checkbox"/> 2305 Elder/Dependent Adult Abuse/Claims Against Skilled Nursing Facility	1, 4
		<input type="checkbox"/> 2306 Intentional Conduct – Sexual Abuse Case (in any form)	1, 4

SHORT TITLE Chase v. FedEx		CASE NUMBER		
	A Civil Case Cover Sheet Case Type	B Type of Action (check only one)	C Applicable Reasons (see Step 3 above)	
Other Personal Injury/Property Damage/Wrongful Death Tort	Product Liability (24)	<input type="checkbox"/> 2307 Construction Accidents	1, 4	
		<input type="checkbox"/> 2308 Landlord – Tenant Habitability (e.g., bed bugs, mold, etc.)	1, 4	
	Medical Malpractice (45)	<input type="checkbox"/> 2401 Product Liability (not asbestos or toxic/ environmental)	1, 4	
		<input type="checkbox"/> 2402 Product Liability – Song-Beverly Consumer Warranty Act (CA Civil Code §§1790-1795.8) (Lemon Law)	1, 3, 5	
	Non-Personal Injury/Property Damage/Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> 0701 Other Commercial/Business Tort (not fraud or breach of contract)	1, 2, 3
			<input type="checkbox"/> 0801 Civil Rights/Discrimination	1, 2, 3
		Defamation (13)	<input type="checkbox"/> 1301 Defamation (slander/libel)	1, 2, 3
			<input type="checkbox"/> 1601 Fraud (no contract)	1, 2, 3
		Professional Negligence (25)	<input type="checkbox"/> 2501 Legal Malpractice	1, 2, 3
			<input type="checkbox"/> 2502 Other Professional Malpractice (not medical or legal)	1, 2, 3
Other (35)		<input type="checkbox"/> 3501 Other Non-Personal Injury/Property Damage Tort	1, 2, 3	
Employment	Wrongful Termination (36)	<input checked="" type="checkbox"/> 3601 Wrongful Termination	1, 2, 3	
		<input type="checkbox"/> 1501 Other Employment Complaint Case	1, 2, 3	
	Other Employment (15)	<input type="checkbox"/> 1502 Labor Commissioner Appeals	10	
Contract	Breach of Contract / Warranty (06) (not insurance)	<input type="checkbox"/> 0601 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2, 5	
		<input type="checkbox"/> 0602 Contract/Warranty Breach – Seller Plaintiff (no fraud/negligence)	2, 5	
		<input type="checkbox"/> 0603 Negligent Breach of Contract/Warranty (no fraud)	1, 2, 5	
		<input type="checkbox"/> 0604 Other Breach of Contract/Warranty (no fraud/ negligence)	1, 2, 5	
		<input type="checkbox"/> 0605 Breach of Rental/Lease Contract (COVID-19 Rental Debt)	2, 5	
	Collections (09)	<input type="checkbox"/> 0901 Collections Case – Seller Plaintiff	5, 6, 11	
		<input type="checkbox"/> 0902 Other Promissory Note/Collections Case	5, 11	
		<input type="checkbox"/> 0903 Collections Case – Purchased Debt (charged off consumer debt purchased on or after January 1, 2014)	5, 6, 11	
		<input type="checkbox"/> 0904 Collections Case – COVID-19 Rental Debt	5, 11	
	Insurance Coverage (18)	<input type="checkbox"/> 1801 Insurance Coverage (not complex)	1, 2, 5, 8	

SHORT TITLE Chase v. FedEx		CASE NUMBER		
	A Civil Case Cover Sheet Case Type:	B Type of Action (check only one)	C Applicable Reasons (see Step 3 above)	
Contract (Continued)	Other Contract (37)	<input type="checkbox"/> 3701 Contractual Fraud	1, 2, 3, 5	
		<input type="checkbox"/> 3702 Tortious Interference	1, 2, 3, 5	
		<input type="checkbox"/> 3703 Other Contract Dispute (not breach/insurance/fraud/negligence)	1, 2, 3, 8, 9	
Real Property	Eminent Domain/ Inverse Condemnation (14)	<input type="checkbox"/> 1401 Eminent Domain/Condemnation Number of Parcels _____	2, 6	
	Wrongful Eviction (33)	<input type="checkbox"/> 3301 Wrongful Eviction Case	2, 6	
		<input type="checkbox"/> 2601 Mortgage Foreclosure	2, 6	
		<input type="checkbox"/> 2602 Quiet Title	2, 6	
	Other Real Property (26)	<input type="checkbox"/> 2603 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6	
		Unlawful Detainer – Commercial (31)	<input type="checkbox"/> 3101 Unlawful Detainer – Commercial (not drugs or wrongful eviction)	6, 11
		Unlawful Detainer – Residential (32)	<input type="checkbox"/> 3201 Unlawful Detainer – Residential (not drugs or wrongful eviction)	6, 11
Unlawful Detainer	Unlawful Detainer – Post Foreclosure (34)	<input type="checkbox"/> 3401 Unlawful Detainer – Post Foreclosure	2, 6, 11	
	Unlawful Detainer – Drugs (38)	<input type="checkbox"/> 3801 Unlawful Detainer – Drugs	2, 6, 11	
	Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> 0501 Asset Forfeiture Case	2, 3, 6
		Petition re Arbitration (11)	<input type="checkbox"/> 1101 Petition to Compel/Confirm/Vacate Arbitration	2, 5
Writ of Mandate (02)		<input type="checkbox"/> 0201 Writ – Administrative Mandamus	2, 8	
		<input type="checkbox"/> 0202 Writ – Mandamus on Limited Court Case Matter	2	
		<input type="checkbox"/> 0203 Writ – Other Limited Court Case Review	2	
Other Judicial Review (39)		<input type="checkbox"/> 3901 Other Writ/Judicial Review	2, 8	
		<input type="checkbox"/> 3902 Administrative Hearing	2, 8	
	<input type="checkbox"/> 3903 Parking Appeal	2, 8		
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> 0301 Antitrust/Trade Regulation	1, 2, 8	
	Asbestos (04)	<input type="checkbox"/> 0401 Asbestos Property Damage	1, 11	
		<input type="checkbox"/> 0402 Asbestos Personal Injury/Wrongful Death	1, 11	

SHORT TITLE Chase v. FedEx		CASE NUMBER	
	A Civil Case Cover Sheet Case Type	B Type of Action (check only one)	C Applicable Reasons (see Step 3 above)
Provisionally Complex Litigation (Continued)	Construction Defect (10)	<input type="checkbox"/> 1001 Construction Defect	1, 2, 3
	Claims Involving Mass Tort (40)	<input type="checkbox"/> 4001 Claims Involving Mass Tort	1, 2, 8
	Securities Litigation (28)	<input type="checkbox"/> 2801 Securities Litigation Case	1, 2, 8
	Toxic Tort Environmental (30)	<input type="checkbox"/> 3001 Toxic Tort/Environmental	1, 2, 3, 8
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> 4101 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> 2001 Sister State Judgment <input type="checkbox"/> 2002 Abstract of Judgment <input type="checkbox"/> 2004 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> 2005 Petition/Certificate for Entry of Judgment Unpaid Tax <input type="checkbox"/> 2006 Other Enforcement of Judgment Case	2, 5, 11 2, 6 2, 8 2, 8 2, 8, 9
	RICO (27)	<input type="checkbox"/> 2701 Racketeering (RICO) Case	1, 2, 8
	Other Complaints (not specified above) (42)	<input type="checkbox"/> 4201 Declaratory Relief Only	1, 2, 8
		<input type="checkbox"/> 4202 Injunctive Relief Only (not domestic/harassment)	2, 8
		<input type="checkbox"/> 4203 Other Commercial Complaint Case (non-tort/noncomplex)	1, 2, 8
<input type="checkbox"/> 4204 Other Civil Complaint (non-tort/non-complex)		1, 2, 8	
Miscellaneous Civil Petitions	Partnership Corporation Governance (21)	<input type="checkbox"/> 2101 Partnership and Corporation Governance Case	2, 8
	Other Petitions (not specified above) (43)	<input type="checkbox"/> 4301 Civil Harassment with Damages	2, 3, 9
		<input type="checkbox"/> 4302 Workplace Harassment with Damages	2, 3, 9
		<input type="checkbox"/> 4303 Elder/Dependent Adult Abuse Case with Damages	2, 3, 9
		<input type="checkbox"/> 4304 Election Contest	2
		<input type="checkbox"/> 4305 Petition for Change of Name/Change of Gender	2, 7
		<input type="checkbox"/> 4306 Petition for Relief from Late Claim Law	2, 3, 8
			<input type="checkbox"/> 4307 Other Civil Petition

SHORT TITLE Chase v. FedEx	CASE NUMBER
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Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address, which is the basis for the filing location including zip code. (No address required for class action cases.)

REASON: <input checked="" type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11	ADDRESS: 330 N. Brand Blvd. Ste. 700	
CITY: Gelndale	STATE: CA	ZIP CODE: 91203

Step 5: Certification of Assignment: I certify that this case is properly filed in the Central District of the Superior Court of California, County of Los Angeles [Code of Civ. Proc., 392 et seq., and LASC Local Rule 2.3(a)(1)(E)]

Dated: 06/27/2023

Charles M. Ray
(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form LASC CIV 109 (01/23).
5. Payment in full of the filing fee, unless there is a court order for waiver, partial or schedule payments.
6. A signed order appointing a Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court to issue a Summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the Summons and Complaint, or other initiating pleading in the case.



Superior Court of California, County of Los Angeles

ALTERNATIVE DISPUTE RESOLUTION (ADR) INFORMATION PACKAGE

THE PLAINTIFF MUST SERVE THIS ADR INFORMATION PACKAGE ON EACH PARTY WITH THE COMPLAINT.

CROSS-COMPLAINANTS must serve this ADR Information Package on any new parties named to the action with the cross-complaint.

What is ADR?

ADR helps people find solutions to their legal disputes without going to trial. The main types of ADR are negotiation, mediation, arbitration, and settlement conferences. When ADR is done by phone, videoconference or computer, it may be called Online Dispute Resolution (ODR). These alternatives to litigation and trial are described below.

Advantages of ADR

- **Saves Time:** ADR is faster than going to trial.
- **Saves Money:** Parties can save on court costs, attorney's fees, and witness fees.
- **Keeps Control** (with the parties): Parties choose their ADR process and provider for voluntary ADR.
- **Reduces Stress/Protects Privacy:** ADR is done outside the courtroom, in private offices, by phone or online.

Disadvantages of ADR

- **Costs:** If the parties do not resolve their dispute, they may have to pay for ADR, litigation, and trial.
- **No Public Trial:** ADR does not provide a public trial or decision by a judge or jury.

Main Types of ADR

1. **Negotiation:** Parties often talk with each other in person, or by phone or online about resolving their case with a settlement agreement instead of a trial. If the parties have lawyers, they will negotiate for their clients.
2. **Mediation:** In mediation, a neutral mediator listens to each person's concerns, helps them evaluate the strengths and weaknesses of their case, and works with them to try to create a settlement agreement that is acceptable to all. Mediators do not decide the outcome. Parties may go to trial if they decide not to settle.

Mediation may be appropriate when the parties

- want to work out a solution but need help from a neutral person.
- have communication problems or strong emotions that interfere with resolution.

Mediation may not be appropriate when the parties

- want a public trial and want a judge or jury to decide the outcome.
- lack equal bargaining power or have a history of physical/emotional abuse.

How to Arrange Mediation in Los Angeles County

Mediation for **civil cases** is voluntary and parties may select any mediator they wish. Options include:

a. **The Civil Mediation Vendor Resource List**

If all parties in an active civil case agree to mediation, they may contact these organizations to request a “Resource List Mediation” for mediation at reduced cost or no cost (for selected cases).

- **ADR Services, Inc.** Assistant Case Manager Janet Solis, janet@adrservices.com
(213) 683-1600
- **Mediation Center of Los Angeles** Program Manager info@mediationLA.org
(833) 476-9145

These organizations cannot accept every case and they may decline cases at their discretion.

They may offer online mediation by video conference for cases they accept. Before contacting these organizations, review important information and FAQs at www.lacourt.org/ADR.Res.List

NOTE: The Civil Mediation Vendor Resource List program does not accept family law, probate, or small claims cases.

b. **Los Angeles County Dispute Resolution Programs.** Los Angeles County-funded agencies provide mediation services on the day of hearings in small claims, unlawful detainer (eviction), civil harassment, and limited civil (collections and non-collection) cases.

<https://dcba.lacounty.gov/countywidedrp/>

Online Dispute Resolution (ODR). Parties in small claims and unlawful detainer (eviction) cases should carefully review the Notice and other information they may receive about (ODR) requirements for their case. <https://my.lacourt.org/odr/>

c. Mediators and ADR and Bar organizations that provide mediation may be found on the internet.

3. **Arbitration:** Arbitration is less formal than trial, but like trial, the parties present evidence and arguments to the person who decides the outcome. In “binding” arbitration, the arbitrator’s decision is final; there is no right to trial. In “nonbinding” arbitration, any party can request a trial after the arbitrator’s decision. For more information about arbitration, visit

<https://www.courts.ca.gov/programs-adr.htm>

4. **Mandatory Settlement Conferences (MSC):** MSCs are ordered by the Court and are often held close to the trial date or on the day of trial. The parties and their attorneys meet with a judge or settlement officer who does not make a decision but who instead assists the parties in evaluating the strengths and weaknesses of the case and in negotiating a settlement. For information about the Court’s MSC programs for civil cases, visit <https://www.lacourt.org/division/civil/CI0047.aspx>

Los Angeles Superior Court ADR website: <https://www.lacourt.org/division/civil/CI0109.aspx>

For general information and videos about ADR, visit [http://www.courts.ca.gov/programs-adr.htm](https://www.courts.ca.gov/programs-adr.htm)

2019-GEN-014-00

FILED
Superior Court of California
County of Los Angeles

MAY 03 2019

Sherri R. Carter, Executive Officer/Clerk
By Rizalinda Mina, Deputy
Rizalinda Mina

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

IN RE LOS ANGELES SUPERIOR COURT) FIRST AMENDED GENERAL ORDER
- MANDATORY ELECTRONIC FILING)
FOR CIVIL)
)
)
)
)

On December 3, 2018, the Los Angeles County Superior Court mandated electronic filing of all documents in Limited Civil cases by litigants represented by attorneys. On January 2, 2019, the Los Angeles County Superior Court mandated electronic filing of all documents filed in Non-Complex Unlimited Civil cases by litigants represented by attorneys. (California Rules of Court, rule 2.253(b).) All electronically filed documents in Limited and Non-Complex Unlimited cases are subject to the following:

1) DEFINITIONS

- a) **“Bookmark”** A bookmark is a PDF document navigational tool that allows the reader to quickly locate and navigate to a designated point of interest within a document.
- b) **“Efiling Portal”** The official court website includes a webpage, referred to as the efiling portal, that gives litigants access to the approved Electronic Filing Service Providers.
- c) **“Electronic Envelope”** A transaction through the electronic service provider for submission of documents to the Court for processing which may contain one or more PDF documents attached.
- d) **“Electronic Filing”** Electronic Filing (eFiling) is the electronic transmission to a Court of a document in electronic form. (California Rules of Court, rule 2.250(b)(7).)

1 e) **“Electronic Filing Service Provider”** An Electronic Filing Service Provider (EFSP) is a
2 person or entity that receives an electronic filing from a party for retransmission to the Court.
3 In the submission of filings, the EFSP does so on behalf of the electronic filer and not as an
4 agent of the Court. (California Rules of Court, rule 2.250(b)(8).)
5 f) **“Electronic Signature”** For purposes of these local rules and in conformity with Code of
6 Civil Procedure section 17, subdivision (b)(3), section 34, and section 1010.6, subdivision
7 (b)(2), Government Code section 68150, subdivision (g), and California Rules of Court, rule
8 2.257, the term “Electronic Signature” is generally defined as an electronic sound, symbol, or
9 process attached to or logically associated with an electronic record and executed or adopted
10 by a person with the intent to sign the electronic record.
11 g) **“Hyperlink”** An electronic link providing direct access from one distinctively marked place
12 in a hypertext or hypermedia document to another in the same or different document.
13 h) **“Portable Document Format”** A digital document format that preserves all fonts,
14 formatting, colors and graphics of the original source document, regardless of the application
15 platform used.

16 2) MANDATORY ELECTRONIC FILING

17 a) Trial Court Records

18 Pursuant to Government Code section 68150, trial court records may be created, maintained,
19 and preserved in electronic format. Any document that the Court receives electronically must
20 be clerically processed and must satisfy all legal filing requirements in order to be filed as an
21 official court record (California Rules of Court, rules 2.100, et seq. and 2.253(b)(6)).

22 b) Represented Litigants

23 Pursuant to California Rules of Court, rule 2.253(b), represented litigants are required to
24 electronically file documents with the Court through an approved EFSP.

25 c) Public Notice

26 The Court has issued a Public Notice with effective dates the Court required parties to
27 electronically file documents through one or more approved EFSPs. Public Notices containing
28 effective dates and the list of EFSPs are available on the Court’s website, at www.lacourt.org.

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1 d) Documents in Related Cases

2 Documents in related cases must be electronically filed in the eFiling portal for that case type if
3 electronic filing has been implemented in that case type, regardless of whether the case has
4 been related to a Civil case.

5 3) EXEMPT LITIGANTS

6 a) Pursuant to California Rules of Court, rule 2.253(b)(2), self-represented litigants are exempt
7 from mandatory electronic filing requirements.

8 b) Pursuant to Code of Civil Procedure section 1010.6, subdivision (d)(3) and California Rules of
9 Court, rule 2.253(b)(4), any party may make application to the Court requesting to be excused
10 from filing documents electronically and be permitted to file documents by conventional
11 means if the party shows undue hardship or significant prejudice.

12 4) EXEMPT FILINGS

13 a) The following documents shall not be filed electronically:

14 i) Peremptory Challenges or Challenges for Cause of a Judicial Officer pursuant to Code of
15 Civil Procedure sections 170.6 or 170.3;

16 ii) Bonds/Undertaking documents;

17 iii) Trial and Evidentiary Hearing Exhibits

18 iv) Any ex parte application that is filed concurrently with a new complaint including those
19 that will be handled by a Writs and Receivers department in the Mosk courthouse; and

20 v) Documents submitted conditionally under seal. The actual motion or application shall be
21 electronically filed. A courtesy copy of the electronically filed motion or application to
22 submit documents conditionally under seal must be provided with the documents
23 submitted conditionally under seal.

24 b) Lodgments

25 Documents attached to a Notice of Lodgment shall be lodged and/or served conventionally in
26 paper form. The actual document entitled, "Notice of Lodgment," shall be filed electronically.

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1 5) ELECTRONIC FILING SYSTEM WORKING PROCEDURES

2 Electronic filing service providers must obtain and manage registration information for persons
3 and entities electronically filing with the court.

4 6) TECHNICAL REQUIREMENTS

5 a) Electronic documents must be electronically filed in PDF, text searchable format **when**
6 technologically feasible without impairment of the document's image.
7 b) The table of contents for any filing must be bookmarked.
8 c) Electronic documents, including but not limited to, declarations, proofs of service, and
9 exhibits, must be bookmarked within the document pursuant to California Rules of Court, rule
10 3.1110(f)(4). Electronic bookmarks must include links to the first page of each bookmarked
11 item (e.g. exhibits, declarations, deposition excerpts) and with bookmark titles that identify the
12 bookmarked item and briefly describe the item.

13 d) Attachments to primary documents must be bookmarked. Examples include, but are not
14 limited to, the following:

15 i) Depositions;
16 ii) Declarations;
17 iii) Exhibits (including exhibits to declarations);
18 iv) Transcripts (including excerpts within transcripts);
19 v) Points and Authorities;
20 vi) Citations; and
21 vii) Supporting Briefs.

22 e) Use of hyperlinks within documents (including attachments and exhibits) is strongly
23 encouraged.

24 f) Accompanying Documents

25 Each document accompanying a single pleading must be electronically filed as a **separate**
26 digital PDF document.

27 g) Multiple Documents

28 Multiple documents relating to one case can be uploaded in one envelope transaction.

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1 h) Writs and Abstracts

2 Writs and Abstracts must be submitted as a separate electronic envelope.

3 i) Sealed Documents

4 If and when a judicial officer orders documents to be filed under seal, those documents must be
5 filed electronically (unless exempted under paragraph 4); the burden of accurately designating
6 the documents as sealed at the time of electronic submission is the submitting party's
7 responsibility.

8 j) Redaction

9 Pursuant to California Rules of Court, rule 1.201, it is the submitting party's responsibility to
10 redact confidential information (such as using initials for names of minors, using the last four
11 digits of a social security number, and using the year for date of birth) so that the information
12 shall not be publicly displayed.

13 7) ELECTRONIC FILING SCHEDULE

14 a) Filed Date

15 i) Any document received electronically by the court between 12:00 am and 11:59:59 pm
16 shall be deemed to have been effectively filed on that court day if accepted for filing. Any
17 document received electronically on a non-court day, is deemed to have been effectively
18 filed on the next court day if accepted. (California Rules of Court, rule 2.253(b)(6); Code
19 Civ. Proc. § 1010.6(b)(3).)20 ii) Notwithstanding any other provision of this order, if a digital document is not filed in due
21 course because of: (1) an interruption in service; (2) a transmission error that is not the
22 fault of the transmitter; or (3) a processing failure that occurs after receipt, the Court may
23 order, either on its own motion or by noticed motion submitted with a declaration for Court
24 consideration, that the document be deemed filed and/or that the document's filing date
25 conform to the attempted transmission date.

26 8) EX PARTE APPLICATIONS

27 a) Ex parte applications and all documents in support thereof must be electronically filed no later
28 than 10:00 a.m. the court day before the ex parte hearing.

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1 b) Any written opposition to an ex parte application must be electronically filed by 8:30 a.m. the
2 day of the ex parte hearing. A printed courtesy copy of any opposition to an ex parte
3 application must be provided to the court the day of the ex parte hearing.

4) PRINTED COURTESY COPIES

5 a) For any filing electronically filed two or fewer days before the hearing, a courtesy copy must
6 be delivered to the courtroom by 4:30 p.m. the same business day the document is efiled. If
7 the efilng is submitted after 4:30 p.m., the courtesy copy must be delivered to the courtroom
8 by 10:00 a.m. the next business day.

9 b) Regardless of the time of electronic filing, a printed courtesy copy (along with proof of
10 electronic submission) is required for the following documents:

11 i) Any printed document required pursuant to a Standing or General Order;

12 ii) Pleadings and motions (including attachments such as declarations and exhibits) of 26
13 pages or more;

14 iii) Pleadings and motions that include points and authorities;

15 iv) Demurrsers;

16 v) Anti-SLAPP filings, pursuant to Code of Civil Procedure section 425.16;

17 vi) Motions for Summary Judgment/Adjudication; and

18 vii) Motions to Compel Further Discovery.

19 c) Nothing in this General Order precludes a Judicial Officer from requesting a courtesy copy of
20 additional documents. Courtroom specific courtesy copy guidelines can be found at
21 www.lacourt.org on the Civil webpage under "Courtroom Information."

22) WAIVER OF FEES AND COSTS FOR ELECTRONICALLY FILED DOCUMENTS

23 a) Fees and costs associated with electronic filing must be waived for any litigant who has
24 received a fee waiver. (California Rules of Court, rules 2.253(b)(), 2.258(b), Code Civ. Proc. §
25 1010.6(d)(2).)

26 b) Fee waiver applications for waiver of court fees and costs pursuant to Code of Civil Procedure
27 section 1010.6, subdivision (b)(6), and California Rules of Court, rule 2.252(f), may be
28 electronically filed in any authorized action or proceeding.

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1 11) SIGNATURES ON ELECTRONIC FILING

2 For purposes of this General Order, all electronic filings must be in compliance with California
3 Rules of Court, rule 2.257. This General Order applies to documents filed within the Civil
4 Division of the Los Angeles County Superior Court.

5

6 This First Amended General Order supersedes any previous order related to electronic filing,
7 and is effective immediately, and is to remain in effect until otherwise ordered by the Civil
8 Supervising Judge and/or Presiding Judge.

9
10 DATED: May 3, 2019

Kevin C. Brazile
KEVIN C. BRAZILE
Presiding Judge



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SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES		Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: Stanley Mosk Courthouse 111 North Hill Street, Los Angeles, CA 90012		FILED Superior Court of California County of Los Angeles 06/27/2023 David W. Slayton, Executive Officer / Clerk of Court By: <u>S. Ruiz</u> Deputy
NOTICE OF CASE ASSIGNMENT UNLIMITED CIVIL CASE		CASE NUMBER: 23STCV14906
Your case is assigned for all purposes to the judicial officer indicated below.		

THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT

ASSIGNED JUDGE		DEPT	ROOM	ASSIGNED JUDGE	DEPT	ROOM
<input checked="" type="checkbox"/>	Daniel S. Murphy	32				

Given to the Plaintiff/Cross-Complainant/Attorney of Record David W. Slayton, Executive Officer / Clerk of Court
on 06/27/2023 By S. Ruiz, Deputy Clerk
(Date)

INSTRUCTIONS FOR HANDLING UNLIMITED CIVIL CASES

The following critical provisions of the California Rules of Court, Title 3, Division 7, as applicable in the Superior Court, are summarized for your assistance.

APPLICATION

The Division 7 Rules were effective January 1, 2007. They apply to all general civil cases.

PRIORITY OVER OTHER RULES

The Division 7 Rules shall have priority over all other Local Rules to the extent the others are inconsistent.

CHALLENGE TO ASSIGNED JUDGE

A challenge under Code of Civil Procedure Section 170.6 must be made within **15** days after notice of assignment for all purposes to a judge, or if a party has not yet appeared, within 15 days of the first appearance.

TIME STANDARDS

Cases assigned to the Independent Calendaring Courts will be subject to processing under the following time standards:

COMPLAINTS

All complaints shall be served within 60 days of filing and proof of service shall be filed within 90 days.

CROSS-COMPLAINTS

Without leave of court first being obtained, no cross-complaint may be filed by any party after their answer is filed. Cross-complaints shall be served within 30 days of the filing date and a proof of service filed within 60 days of the filing date.

STATUS CONFERENCE

A status conference will be scheduled by the assigned Independent Calendar Judge no later than 270 days after the filing of the complaint. Counsel must be fully prepared to discuss the following issues: alternative dispute resolution, bifurcation, settlement, trial date, and expert witnesses.

FINAL STATUS CONFERENCE

The Court will require the parties to attend a final status conference not more than 10 days before the scheduled trial date. All parties shall have motions in limine, bifurcation motions, statements of major evidentiary issues, dispositive motions, requested form jury instructions, special jury instructions, and special jury verdicts timely filed and served prior to the conference. These matters may be heard and resolved at this conference. At least five days before this conference, counsel must also have exchanged lists of exhibits and witnesses, and have submitted to the court a brief statement of the case to be read to the jury panel as required by Chapter Three of the Los Angeles Superior Court Rules.

SANCTIONS

The court will impose appropriate sanctions for the failure or refusal to comply with Chapter Three Rules, orders made by the Court, and time standards or deadlines established by the Court or by the Chapter Three Rules. Such sanctions may be on a party, or if appropriate, on counsel for a party.

This is not a complete delineation of the Division 7 or Chapter Three Rules, and adherence only to the above provisions is therefore not a guarantee against the imposition of sanctions under Trial Court Delay Reduction. Careful reading and compliance with the actual Chapter Rules is imperative.

Class Actions

Pursuant to Local Rule 2.3, all class actions shall be filed at the Stanley Mosk Courthouse and are randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be a class action it will be returned to an Independent Calendar Courtroom for all purposes.

***Provisionally Complex Cases**

Cases filed as provisionally complex are initially assigned to the Supervising Judge of complex litigation for determination of complex status. If the case is deemed to be complex within the meaning of California Rules of Court 3.400 et seq., it will be randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be complex, it will be returned to an Independent Calendar Courtroom for all purposes.

VOLUNTARY EFFICIENT LITIGATION STIPULATIONS



Superior Court of California
County of Los Angeles



Los Angeles County
Bar Association
Litigation Section

Los Angeles County
Bar Association Labor and
Employment Law Section



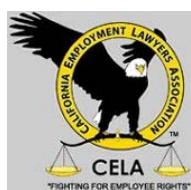
Consumer Attorneys
Association of Los Angeles



Southern California
Defense Counsel



Association of
Business Trial Lawyers



California Employment
Lawyers Association

The Early Organizational Meeting Stipulation, Discovery Resolution Stipulation, and Motions in Limine Stipulation are voluntary stipulations entered into by the parties. The parties may enter into one, two, or all three of the stipulations; however, they may not alter the stipulations as written, because the Court wants to ensure uniformity of application. These stipulations are meant to encourage cooperation between the parties and to assist in resolving issues in a manner that promotes economic case resolution and judicial efficiency.

The following organizations endorse the goal of promoting efficiency in litigation and ask that counsel consider using these stipulations as a voluntary way to promote communications and procedures among counsel and with the court to fairly resolve issues in their cases.

◆Los Angeles County Bar Association Litigation Section◆

◆ Los Angeles County Bar Association Labor and Employment Law Section◆

◆Consumer Attorneys Association of Los Angeles◆

◆Southern California Defense Counsel◆

◆Association of Business Trial Lawyers◆

◆California Employment Lawyers Association◆

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:	STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):	FAX NO. (Optional):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES		
COURTHOUSE ADDRESS:		
PLAINTIFF:		
DEFENDANT:		
STIPULATION – EARLY ORGANIZATIONAL MEETING		CASE NUMBER:

This stipulation is intended to encourage cooperation among the parties at an early stage in the litigation and to assist the parties in efficient case resolution.

The parties agree that:

1. The parties commit to conduct an initial conference (in-person or via teleconference or via videoconference) within 15 days from the date this stipulation is signed, *to discuss and consider whether there can be agreement on the following:*
 - a. Are motions to challenge the pleadings necessary? If the issue can be resolved by amendment as of right, or if the Court would allow leave to amend, could an amended complaint resolve most or all of the issues a demurrer might otherwise raise? If so, the parties agree to work through pleading issues so that a demurrer need only raise issues they cannot resolve. Is the issue that the defendant seeks to raise amenable to resolution on demurrer, or would some other type of motion be preferable? Could a voluntary targeted exchange of documents or information by any party cure an uncertainty in the pleadings?
 - b. Initial mutual exchanges of documents at the “core” of the litigation. (For example, in an employment case, the employment records, personnel file and documents relating to the conduct in question could be considered “core.” In a personal injury case, an incident or police report, medical records, and repair or maintenance records could be considered “core.”);
 - c. Exchange of names and contact information of witnesses;
 - d. Any insurance agreement that may be available to satisfy part or all of a judgment, or to indemnify or reimburse for payments made to satisfy a judgment;
 - e. Exchange of any other information that might be helpful to facilitate understanding, handling, or resolution of the case in a manner that preserves objections or privileges by agreement;
 - f. Controlling issues of law that, if resolved early, will promote efficiency and economy in other phases of the case. Also, when and how such issues can be presented to the Court;
 - g. Whether or when the case should be scheduled with a settlement officer, what discovery or court ruling on legal issues is reasonably required to make settlement discussions meaningful, and whether the parties wish to use a sitting judge or a private mediator or other options as

SHORT TITLE:	CASE NUMBER:
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discussed in the "Alternative Dispute Resolution (ADR) Information Package" served with the complaint;

- h. Computation of damages, including documents, not privileged or protected from disclosure, on which such computation is based;
- i. Whether the case is suitable for the Expedited Jury Trial procedures (see information at www.lacourt.org under "Civil" and then under "General Information").

2. The time for a defending party to respond to a complaint or cross-complaint will be extended to _____ for the complaint, and _____ for the cross-
(INSERT DATE) (INSERT DATE)
 complaint, which is comprised of the 30 days to respond under Government Code § 68616(b), and the 30 days permitted by Code of Civil Procedure section 1054(a), good cause having been found by the Civil Supervising Judge due to the case management benefits provided by this Stipulation. A copy of the General Order can be found at www.lacourt.org under "Civil", click on "General Information", then click on "Voluntary Efficient Litigation Stipulations".

3. The parties will prepare a joint report titled "Joint Status Report Pursuant to Initial Conference and Early Organizational Meeting Stipulation, and if desired, a proposed order summarizing results of their meet and confer and advising the Court of any way it may assist the parties' efficient conduct or resolution of the case. The parties shall attach the Joint Status Report to the Case Management Conference statement, and file the documents when the CMC statement is due.

4. References to "days" mean calendar days, unless otherwise noted. If the date for performing any act pursuant to this stipulation falls on a Saturday, Sunday or Court holiday, then the time for performing that act shall be extended to the next Court day

The following parties stipulate:

Date:

Date:	(TYPE OR PRINT NAME)

➤	(ATTORNEY FOR PLAINTIFF)
➤	(ATTORNEY FOR DEFENDANT)
➤	(ATTORNEY FOR DEFENDANT)
➤	(ATTORNEY FOR DEFENDANT)
➤	(ATTORNEY FOR _____)
➤	(ATTORNEY FOR _____)
➤	(ATTORNEY FOR _____)

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:	STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):	FAX NO. (Optional):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES		
COURTHOUSE ADDRESS:		
PLAINTIFF:		
DEFENDANT:		
STIPULATION – DISCOVERY RESOLUTION		CASE NUMBER:

This stipulation is intended to provide a fast and informal resolution of discovery issues through limited paperwork and an informal conference with the Court to aid in the resolution of the issues.

The parties agree that:

1. Prior to the discovery cut-off in this action, no discovery motion shall be filed or heard unless the moving party first makes a written request for an Informal Discovery Conference pursuant to the terms of this stipulation.
2. At the Informal Discovery Conference the Court will consider the dispute presented by parties and determine whether it can be resolved informally. Nothing set forth herein will preclude a party from making a record at the conclusion of an Informal Discovery Conference, either orally or in writing.
3. Following a reasonable and good faith attempt at an informal resolution of each issue to be presented, a party may request an Informal Discovery Conference pursuant to the following procedures:
 - a. The party requesting the Informal Discovery Conference will:
 - i. File a Request for Informal Discovery Conference with the clerk's office on the approved form (copy attached) and deliver a courtesy, conformed copy to the assigned department;
 - ii. Include a brief summary of the dispute and specify the relief requested; and
 - iii. Serve the opposing party pursuant to any authorized or agreed method of service that ensures that the opposing party receives the Request for Informal Discovery Conference no later than the next court day following the filing.
 - b. Any Answer to a Request for Informal Discovery Conference must:
 - i. Also be filed on the approved form (copy attached);
 - ii. Include a brief summary of why the requested relief should be denied;

SHORT TITLE:	CASE NUMBER:
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- iii. Be filed within two (2) court days of receipt of the Request; and
- iv. Be served on the opposing party pursuant to any authorized or agreed upon method of service that ensures that the opposing party receives the Answer no later than the next court day following the filing.
- c. No other pleadings, including but not limited to exhibits, declarations, or attachments, will be accepted.
- d. If the Court has not granted or denied the Request for Informal Discovery Conference within ten (10) days following the filing of the Request, then it shall be deemed to have been denied. If the Court acts on the Request, the parties will be notified whether the Request for Informal Discovery Conference has been granted or denied and, if granted, the date and time of the Informal Discovery Conference, which must be within twenty (20) days of the filing of the Request for Informal Discovery Conference.
- e. If the conference is not held within twenty (20) days of the filing of the Request for Informal Discovery Conference, unless extended by agreement of the parties and the Court, then the Request for the Informal Discovery Conference shall be deemed to have been denied at that time.

4. If (a) the Court has denied a conference or (b) one of the time deadlines above has expired without the Court having acted or (c) the Informal Discovery Conference is concluded without resolving the dispute, then a party may file a discovery motion to address unresolved issues.

5. The parties hereby further agree that the time for making a motion to compel or other discovery motion is tolled from the date of filing of the Request for Informal Discovery Conference until (a) the request is denied or deemed denied or (b) twenty (20) days after the filing of the Request for Informal Discovery Conference, whichever is earlier, unless extended by Order of the Court.

It is the understanding and intent of the parties that this stipulation shall, for each discovery dispute to which it applies, constitute a writing memorializing a "specific later date to which the propounding [or demanding or requesting] party and the responding party have agreed in writing," within the meaning of Code Civil Procedure sections 2030.300(c), 2031.320(c), and 2033.290(c).

- 6. Nothing herein will preclude any party from applying *ex parte* for appropriate relief, including an order shortening time for a motion to be heard concerning discovery.
- 7. Any party may terminate this stipulation by giving twenty-one (21) days notice of intent to terminate the stipulation.
- 8. References to "days" mean calendar days, unless otherwise noted. If the date for performing any act pursuant to this stipulation falls on a Saturday, Sunday or Court holiday, then the time for performing that act shall be extended to the next Court day.

SHORT TITLE:	CASE NUMBER:
--------------	--------------

The following parties stipulate:

Date:

(TYPE OR PRINT NAME)



(ATTORNEY FOR PLAINTIFF)



(ATTORNEY FOR DEFENDANT)



(ATTORNEY FOR DEFENDANT)



(ATTORNEY FOR DEFENDANT)



(ATTORNEY FOR _____)



(ATTORNEY FOR _____)



(ATTORNEY FOR _____)

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NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:	STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):	FAX NO. (Optional):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES		
COURTHOUSE ADDRESS:		
PLAINTIFF:		
DEFENDANT:		
INFORMAL DISCOVERY CONFERENCE (pursuant to the Discovery Resolution Stipulation of the parties)		CASE NUMBER:

1. This document relates to:
 - Request for Informal Discovery Conference
 - Answer to Request for Informal Discovery Conference
2. Deadline for Court to decide on Request: _____ (insert date 10 calendar days following filing of the Request).
3. Deadline for Court to hold Informal Discovery Conference: _____ (insert date 20 calendar days following filing of the Request).
4. For a Request for Informal Discovery Conference, briefly describe the nature of the discovery dispute, including the facts and legal arguments at issue. For an Answer to Request for Informal Discovery Conference, briefly describe why the Court should deny the requested discovery, including the facts and legal arguments at issue.

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:	STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):	FAX NO. (Optional):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES		
COURTHOUSE ADDRESS:		
PLAINTIFF:		
DEFENDANT:		
STIPULATION AND ORDER – MOTIONS IN LIMINE		CASE NUMBER:

This stipulation is intended to provide fast and informal resolution of evidentiary issues through diligent efforts to define and discuss such issues and limit paperwork.

The parties agree that:

1. At least ____ days before the final status conference, each party will provide all other parties with a list containing a one paragraph explanation of each proposed motion in limine. Each one paragraph explanation must identify the substance of a single proposed motion in limine and the grounds for the proposed motion.
2. The parties thereafter will meet and confer, either in person or via teleconference or videoconference, concerning all proposed motions in limine. In that meet and confer, the parties will determine:
 - a. Whether the parties can stipulate to any of the proposed motions. If the parties so stipulate, they may file a stipulation and proposed order with the Court.
 - b. Whether any of the proposed motions can be briefed and submitted by means of a short joint statement of issues. For each motion which can be addressed by a short joint statement of issues, a short joint statement of issues must be filed with the Court 10 days prior to the final status conference. Each side's portion of the short joint statement of issues may not exceed three pages. The parties will meet and confer to agree on a date and manner for exchanging the parties' respective portions of the short joint statement of issues and the process for filing the short joint statement of issues.
3. All proposed motions in limine that are not either the subject of a stipulation or briefed via a short joint statement of issues will be briefed and filed in accordance with the California Rules of Court and the Los Angeles Superior Court Rules.

SHORT TITLE:	CASE NUMBER:
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The following parties stipulate:

Date:

(TYPE OR PRINT NAME)



(ATTORNEY FOR PLAINTIFF)



(ATTORNEY FOR DEFENDANT)



(ATTORNEY FOR DEFENDANT)



(ATTORNEY FOR DEFENDANT)



(ATTORNEY FOR _____)



(ATTORNEY FOR _____)



(ATTORNEY FOR _____)

THE COURT SO ORDERS.

Date:

JUDICIAL OFFICER

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FILED
LOS ANGELES SUPERIOR COURT

MAY 11 2011

JOHN A. CLARKE, CLERK
N. Navarro
BY NANCY NAVARRO, DEPUTY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

General Order Re) ORDER PURSUANT TO CCP 1054(a),
Use of Voluntary Efficient Litigation) EXTENDING TIME TO RESPOND BY
Stipulations) 30 DAYS WHEN PARTIES AGREE
) TO EARLY ORGANIZATIONAL
) MEETING STIPULATION
)

Whereas the Los Angeles Superior Court and the Executive Committee of the Litigation Section of the Los Angeles County Bar Association have cooperated in drafting "Voluntary Efficient Litigation Stipulations" and in proposing the stipulations for use in general jurisdiction civil litigation in Los Angeles County:

Whereas the Los Angeles County Bar Association Litigation Section; the Los Angeles County Bar Association Labor and Employment Law Section; the Consumer Attorneys Association of Los Angeles; the Association of Southern California Defense Counsel; the Association of Business Trial Lawyers of Los Angeles; and the California Employment Lawyers Association all "endorse the goal of promoting efficiency in litigation, and ask that counsel consider using these stipulations as a voluntary way to promote communications and procedures among counsel and with the court to fairly resolve issues in their cases."

1 Whereas the Early Organizational Meeting Stipulation is intended to encourage
2 cooperation among the parties at an early stage in litigation in order to achieve
3 litigation efficiencies;

4 Whereas it is intended that use of the Early Organizational Meeting Stipulation
5 will promote economic case resolution and judicial efficiency;

6 Whereas, in order to promote a meaningful discussion of pleading issues at the
7 Early Organizational Meeting and potentially to reduce the need for motions to
8 challenge the pleadings, it is necessary to allow additional time to conduct the Early
9 Organizational Meeting before the time to respond to a complaint or cross complaint
10 has expired;

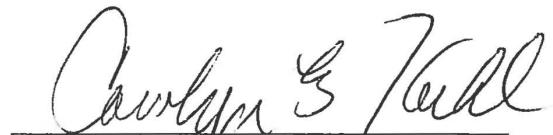
11 Whereas Code of Civil Procedure section 1054(a) allows a judge of the court in
12 which an action is pending to extend for not more than 30 days the time to respond to
13 a pleading "upon good cause shown";

14 Now, therefore, this Court hereby finds that there is good cause to extend for 30
15 days the time to respond to a complaint or to a cross complaint in any action in which
16 the parties have entered into the Early Organizational Meeting Stipulation. This finding
17 of good cause is based on the anticipated judicial efficiency and benefits of economic
18 case resolution that the Early Organizational Meeting Stipulation is intended to
19 promote.

20 IT IS HEREBY ORDERED that, in any case in which the parties have entered
21 into an Early Organizational Meeting Stipulation, the time for a defending party to
22 respond to a complaint or cross complaint shall be extended by the 30 days permitted
23

1 by Code of Civil Procedure section 1054(a) without further need of a specific court
2 order.

3 DATED: May 11, 2011



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5 Carolyn B. Kuhl, Supervising Judge of the
6 Civil Departments, Los Angeles Superior Court
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RAY & SEYB LLP
CHARLES M. RAY SBN 282440
SPENCER L. SEYB, SBN 282501
2062 Business Center Drive, Suite 230
Irvine, CA 92612
Tele: 949-734.7333
Fax: 949-274-8151
c.ray@rayseyb.com
s.seyb@rayseyb.com

Attorneys for Plaintiff:
RICHARD CHASE

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

RICHARD CHASE an individual,

Plaintiff,

CASE No.: 23STCV14906

**AMENDMENT TO COMPLAINT
NAMING DOE 1**

v.
FEDEX, INC.; and DOES 1 through 100,
inclusive, and each of them.

Defendants



1 Upon the filing of the complaint, the plaintiff being ignorant of the true name of the
2 following defendant and having designated this defendant in the complaint by a fictitious name,
3 hereby identifies defendant's true name as follows:

4 DOE 1: Federal Express Corporation

5
6 DATED: September 14, 2023

RAY & SEYB LLP

7 By: 
8 Charles M. Ray
9 Attorney for Plaintiff
10 RICHARD CHASE



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PROOF OF SERVICE

1 STATE OF CALIFORNIA, COUNTY OF ORANGE

2 I certify and declare as follows:

3 I am employed in the County of Orange, State of California. I am over the age of 18 and
4 not a party to the within action; my business address is 2062 Business Center Drive, Ste. 230,
5 Irvine, CA 92612.

6 On **September 14, 2023**, I served:

7 **AMENDMENT TO COMPLAINT NAMING DOE 1**

8 on the party(ies) of record in this action by transmitting pdf versions of them via electronic mail
9 to the person identified below and using the email address indicated.

10

Jane M. Flynn, Esq. FEDERAL EXPRESS CORPORATION 2601 Main Street Suite 340 Irvine, CA 92614 Email: jane.flynn@fedex.com	Attorneys for Defendant FEDERAL EXPRESS CORPORATION
--	---

15

I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct.

16

DATED: September 14, 2023

By: Andrea Dubois
ANDREA DUBOIS

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PROOF OF SERVICE

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SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES		Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: Stanley Mosk Courthouse 111 North Hill Street, Los Angeles, CA 90012		FILED Superior Court of California County of Los Angeles 07/07/2023
PLAINTIFF: Richard Chase		David W. Slayton, Executive Officer / Clerk of Court By: <u>M. Navarro</u> Deputy
DEFENDANT: FedEx Inc.		CASE NUMBER: 23STCV14906
NOTICE OF CASE MANAGEMENT CONFERENCE		

TO THE PLAINTIFF(S)/ATTORNEY(S) FOR PLAINTIFF(S) OF RECORD:

You are ordered to serve this notice of hearing on all parties/attorneys of record forthwith, and meet and confer with all parties/attorneys of record about the matters to be discussed no later than 30 days before the Case Management Conference.

Your Case Management Conference has been scheduled at the courthouse address shown above on:

Date:	Time:	Dept.:
10/23/2023	8:30 AM	32

NOTICE TO DEFENDANT: THE SETTING OF THE CASE MANAGEMENT CONFERENCE DOES NOT EXEMPT THE DEFENDANT FROM FILING A RESPONSIVE PLEADING AS REQUIRED BY LAW.

Pursuant to California Rules of Court, rules 3.720-3.730, a completed Case Management Statement (Judicial Council form # CM-110) must be filed at least 15 calendar days prior to the Case Management Conference. The Case Management Statement may be filed jointly by all parties/attorneys of record or individually by each party/attorney of record. You must be familiar with the case and be fully prepared to participate effectively in the Case Management Conference.

At the Case Management Conference, the Court may make pretrial orders including the following, but not limited to, an order establishing a discovery schedule; an order referring the case to Alternative Dispute Resolution (ADR); an order reclassifying the case; an order setting subsequent conference and the trial date; or other orders to achieve the goals of the Trial Court Delay Reduction Act (Gov. Code, § 68600 et seq.)

Notice is hereby given that if you do not file the Case Management Statement or appear and effectively participate at the Case Management Conference, the Court may impose sanctions, pursuant to LASC Local Rule 3.37, Code of Civil Procedure sections 177.5, 575.2, 583.150, 583.360 and 583.410, Government Code section 68608, subdivision (b), and California Rules of Court, rule 2.2 et seq.

Dated: 07/07/2023



Daniel S. Murphy / Judge
Judicial Officer

CERTIFICATE OF SERVICE

I, the below named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Notice of Case Management Conference upon each party or counsel named below:

by depositing in the United States mail at the courthouse in Los Angeles, California, one copy of the original filed herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid.

by personally giving the party notice upon filing of the complaint.

Charles M. Ray
2062 Business Center Drive
Ste 230
Irvine, CA 92612

David W. Slayton, Executive Officer / Clerk of Court

Dated: 07/07/2023

By M. Navarro
Deputy Clerk